

REMARKS

Claims 1-37 are pending, and claims 1-37 stand rejected. By virtue of this response, claims 1, 19, and 37 have been amended, no new claims have been added, and no claims have been cancelled. The amendments to the claims are supported at least by paragraph [0048] (with reference to the application as published). No new matter has been added. Accordingly, claims 1-37 are currently under consideration. Amendment and cancellation of certain claims is not to be construed as a dedication to the public of any of the subject matter of the claims as previously presented.

For the Examiner's convenience, Applicants' remarks are presented in the same order in which they were raised in the Office Action.

Claim Rejections – 35 U.S.C. § 101

Claim 1 stands rejected under 35 U.S.C. 101, because, based on Supreme Court precedent, a method/process claim must (1) be tied to another statutory class invention (such as a particular apparatus) or (2) transform underlying subject matter (such as an article or materials) to a different state or thing. The Examiner states “[w]hile the claim does recite minimal use of a database, there is no specific data manipulation or calculation that is taking place by using a computer.”

Applicants submit that the rejection should be withdrawn at least because claim 1 has been amended to recite “a computer implemented method,” and further the claim recites “generating recommendations in response to the triggering event in accordance with the correlations between the user events in the database.” Accordingly, the method is tied to an apparatus (i.e., a computer). Further, the latter features of claim 1 recite a specific manipulation of data, e.g., generating recommendation in response to a triggering event in accordance with the correlations between user events in the database. Accordingly, Applicants submit the rejection should be withdrawn.

Claim Rejections – 35 U.S.C. § 102

Claims 1, 2, 13-15, 19, 20, 31-33, and 37 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Tuzhilin (U.S. Patent Number 6,236,978).

Applicants have amended independent claim 1 to recite “collecting user events of a first and a second user across a plurality of domains in a database.” Independent claims 19 and 37 have been amended similarly to claim 1. The amendments are fully supported by the application as filed, e.g., see at least paragraph [0048] of the application as published. As described therein, user events across multiple domains may be collected over the entire user population to determine the correlations between user events. These correlation values may be used to generate recommendations to subsequent users who demonstrate similar user behaviors. Accordingly, no new matter has been added.

Applicants submit that the features of claims 1, 19, and 37 (as amended) are not disclosed or reasonably suggested by Tuzhilin. Tuzhilin discloses a method for generating recommendations to a user, but in clear contrast to the recited features, describes that only a user’s own factual user information and transactional information are collected in the user’s user profile (see, e.g., Abstract, lines 1-5). Tuzhilin fails to disclose or suggest that other users’ profiles are analyzed or being correlated with each other in order to estimate the needs of a particular user (see, e.g., column 13, line 66 to column 14, line 1). For example, Tuzhilin discloses that if the system estimates that user X wants to buy a perfume in Paris based on user X’s past purchasing history, user X’s static and dynamic profiles, and user X’s current “state,” then the “state of the world” module may recommend user X to buy Christian Dior perfumes that are on sale at the airport in Paris. (See column 13, line 66 to column 14, line 7). Tuzhilin does not disclose or suggest, however, collecting user events of a first and a second user across a plurality of domains, analyzing the user events to formulate correlations between the user events, and generating recommendations in accordance with the correlations between the user events.

Accordingly, for at least these reasons, the rejection to claims 1, 19, and 37 must be withdrawn and claims 1, 19, and 37 (and all claims depending therefrom) allowed.

Claim Rejections – 35 U.S.C. § 103

Claims 3-12, 16-18, 21-30, and 34-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tuzhilin in view of Smith et al. (U.S. Publication No. 2002/0010625).

Claims 3-12, 16-18, 21-30, and 34-36 depend from claims 1, 19, and 37 respectively and are allowable over Tuzhilin for at least the same reasons as claims 1, 19, and 37 discussed above. The addition of Smith fails to cure the deficiencies of Tuzhilin. Accordingly, the rejection should be withdrawn.

CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. 324212000500. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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